

# Josh Bernstein, P.C.

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## Civil Rights & Employment Law

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**Susan Baldwin v. Goddard Riverside Community Center (Index No. 1:11-cv-07591)**

**RE: Request for One-Week Extension to Summary Judgment Briefing Schedule**

March 15, 2013

The Honorable Paul G. Gardephe  
United States District Court, Southern District of New York  
500 Pearl St., Room 920  
New York, NY 10007-1312

Judge Gardephe,

LSDC SDNY  
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I write with the consent of Defendant to request a one-week extension to the existing deadlines for Plaintiff's Opposition to Defendant's Motion for Summary Judgment and Defendant's Reply. The current deadlines are March 15, 2013 for Plaintiff's Opposition and March 29 for Defendant's Reply.

The proposed extended deadlines are: March 22, 2013 for Plaintiff's Opposition and April 5<sup>th</sup>, 2013 for Defendant's Reply.

This is the second request for an extension to the relevant deadlines, the prior request for a two-week extension (at Defendant's request) having been granted by your Honor. The reason for this request for extension is that counsel for Plaintiff has been addressing a personal medical issue over the last few weeks that has inhibited counsel's ability to finish Plaintiff's Opposition.

Very Truly Yours,

/s/

Joshua Alexander Bernstein

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

Paul G. Gardephe  
Paul G. Gardephe, U.S.D.J.

Dated: March 15, 2013

Cc: Michael Tiliakos, Esq. (by fax)